

THE LAW OFFICE OF GREGORY JAVARDIAN, LLC

By: Mary F. Kennedy, Esquire

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Southampton, PA 18966

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Attorney for Citizens Bank of Pennsylvania

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Charles C. Redden, Jr.

Debtor(s)

Chapter 13 Proceeding

18-12523 MDC

**STIPULATION BY AND BETWEEN CHARLES C. REDDEN, JR. AND
CITIZENS BANK OF PENNSYLVANIA**

**WHEREAS, on August 10, 2018 Citizens Bank of Pennsylvania's (hereinafter
"Citizens Bank") filed a Motion for Relief from Stay;**

**WHEREAS, the parties resolved the Motion for Relief from Stay and a
Stipulation was approved by the Court on October 4, 2018;**

**WHEREAS, the Stipulation required the Debtor(s) to remain current on the post-
petition mortgage payments;**

**WHEREAS, the Stipulation allowed Citizens Bank to send a Notice of Default if
any payments were missed and provided for the filing of a Certificate of Default if a
default was not cured;**

**WHEREAS, on February 19, 2019 Citizens Bank mailed Debtor(s) and Debtor(s)'`
Attorney a Notice of Default;**

WHEREAS, on March 11, 2019 Citizens Bank filed a Certificate of Default;

WHEREAS, an Order was entered on March 19, 2019 granting Citizens Bank relief from the stay;

WHEREAS, Debtor has provided Counsel for Movant funds sufficient to cure the default shown in the Certificate of Default; and

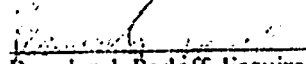
WHEREAS, the parties hereto, and their respective counsel, wish to vacate the relief order.

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:

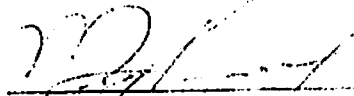
- 1. The March 19, 2019, Order granting Citizens Bank of Pennsylvania relief from the stay is vacated.**
- 2. Counsel for Citizens Bank has received two (2) money orders totaling \$635.73. This payment shall cure the arrears including the \$200.00 in attorney fees shown in the Certificate of Default filed on March 11, 2019.**
- 3. The parties agree that the Stipulation resolving Citizens Bank's Motion for Relief from Stay that was approved by the Court on October 4, 2018 is again in in full force and effect.**

4. The parties agree that a facsimile may be submitted to the Court as if it were an original.

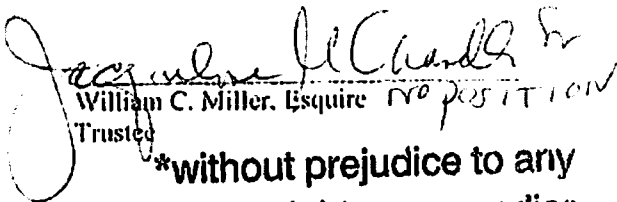
STIPULATED AND AGREED TO BY:


Brandon J. Perloff, Esquire
Attorney for Debtor, Charles C. Redden, Jr

Date: _____


Mary F. Kennedy, Esquire
Attorney for Citizens Bank of Pennsylvania

Date: 2/25/2019


William C. Miller, Esquire
Trustee

Date: 4/2/19

***without prejudice to any
trustee rights or remedies**

On this ____ day of _____, 2019, approved by the Court.

United States Bankruptcy Judge
Magdeline D. Coleman

cc: Mary F. Kennedy, Esquire
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Southampton, PA 18966

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